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JOHN HADDER: Good evening, everybody. I feel welcome here in Pahrump. Thank you very much, and my name is John Hadder, last name is H-a-d-d-e-r. I'm the Northern Nevada coordinator for Citizen Alert. Citizen Alert will be submitting written comments later, assuming we have time, but for right now I just have a few oral comments at this point.

1 This sort of addresses the initial -- the first point addresses the intent of this document, the Supplement to the Draft EIS. [Citizen Alert appears as though the Supplement is an attempt to facilitate an unrealistic timeline on the Yucca Mountain project by avoiding a rewrite of the EIS.

Clearly the Department of Energy has made changes to the repository design which have evolved sufficiently to be considered substantive, requiring a reevaluation of the environmental impacts; however, the Supplement continually refers to the Yucca Mountain science and engineering flexible design report for the details and the design changes. ]

2 [We heard a couple of examples tonight of that with water in the pools and the size of the pools. There are many of these sort of references, so as was stated earlier you basically need the Science and Engineering Report as well. So most of these details should be readily available in the Supplement to fully realize the impacts of the new design. Instead one needs to read significant portions of the Science and Engineering Report; therefore, any quantitative, and to some extent qualitative, comment on the new design is effectively a comment on the Yucca Mountain Science and Engineering Report that few had the time to read in the allotted 45 days available for public comment.

3... The Supplement doesn't serve as a stand-alone document, and in our opinion it was never intended to serve in that capacity. Citizen Alert sees the Supplement as cheating the public an opportunity to comment in a complete and proper way on the new design concept. ] In terms of the comment period, again 45 days is an unbelievably short allowance for a technical document, and again fits into an unrealistic timeline.

The DOE has been studying Yucca Mountain for over ten years. Certainly they can spare a little more time for the public to understand the nature and specific impacts of the changes to the repository. 90 days is, in Citizen Alert's opinion, a bare minimum, bare minimum. The Department of Energy needs to take into account the time available in people's lives. Even the staff of Citizen Alert is having difficulty meeting the June 25th cutoff for comment and it's part of our job, like Nye County.

Given that this Yucca Mountain Science and Engineering Report is an integral component to the complete understanding of the new design, the task seems hopeless. So this disempowers the public. Of course, if the Yucca Mountain Science and Engineering Report had been officially part of the comment documentation,

3 cont. then the DOE would have to open public comment for a much longer time, which again they aren't willing to do that given the timeline they're trying to meet.

4... The other procedural point of concern is conflicting comment periods. Actually this was brought up earlier. Citizen Alert is reminded of two years ago when the Department of Energy released its proposed changes to the site suitability guidelines for Yucca Mountain, and the Draft Environmental Impact Statement at about the same time creating an overlap in comment periods for both. That process complicated the overall public comment period making it much more difficult for the public to engage in the hearings. At Citizen Alert we would have conversations with members of the public that went something like this:

PUBLIC: I saw a flyer for the hearings this Tuesday at 7:00 on Yucca Mountain, and you're telling me that there's a hearing on Thursday. Now, which is it?

CITIZEN ALERT: There are two. Now, one is the Environmental Impact Statement, the Draft, and the other is a site suitability guideline.

PUBLIC: So I am to comment twice on Yucca Mountain in one week? Isn't that repetitious?

Well, no, it's not. They cover different issues.

But they're both about Yucca Mountain?

Well, yes, but the site suitability determines whether Yucca Mountain is acceptable for disposing of the nation's high-level reactive waste.

PUBLIC: But isn't that what the EIS is supposed to determine?

Well, yes, ultimately, but the guidelines are a criteria for a selection that the EIS assumed that the site must meet.

PUBLIC: So you're saying that these guidelines are part of the EIS. Now, why are we commenting separately or...

You get the idea. We had a lot of these conversations over a period of time. Comment periods for these distinct components of the process should be well separated in time to allow the public, who usually don't

- 4 cont. have the time to study the procedures in detail, to know why they are commenting and how the particular hearing they are attending fits into the overall scheme.

Now, history is repeating itself. I'm almost done. History is repeating itself in that the comment period for the Supplemental Draft EIS and the Site Recommendation are concurrent. Citizen Alert would rather see, as in our request to Secretary Richardson dated June 2000, all hearings around the EIS completed and the Final EIS done and released to the public prior to the Site Recommendation comment period. This is what ought to happen. |

Thank you very much.